

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI (GULFPORT DIVISION)**

IN RE: KAREN MCDANIEL TODD

**CASE NO.: 20-50110-KMS
CHAPTER 13**

RESPONSE TO MOTION TO APPROVE THE SALE OF CERTAIN REAL PROPERTY

COMES NOW, Wells Fargo Bank, N.A. ("Creditor"), by and through its attorney, and files this response to the Debtor's Motion to Approve the Sale of Certain Real Property [Dk# 61], and respectfully submits the following:

1. Wells Fargo Bank, N.A. is a secured creditor in the above entitled case by virtue of its holding a Note secured by a Deed of Trust affecting property of the Debtor located at 319 West Sibley Circle, Pachuta, MS 39347. The Note and Deed of Trust is payable in monthly installments and the property affected by the mortgage is the home of the Debtor.

2. Creditor has no objection to the property at issue being sold, however, Wells Fargo Bank, N.A. requests that the ongoing monthly mortgage payments are maintained.

3. Creditor requests that the sales price not be less than the full amount owed by the Debtor, and that its lien be paid in full out of the proceeds of the sale.

4. If the sale price is less than the full amount owed by the Debtors to pay the lien, then Creditor requests and requires prior approval and review of any short sale. Creditor reserves the right to deny any short sale requests. Further, Creditor requests that there be no requirement to withdraw the claim in the event the sale does not happen.

5. Creditor requests that the deadline for the sale closing and receipt of funds from said sale should be within sixty (60) days from the date of any Order on Debtor's Motion to Approve the Sale of Certain Real Property [Dk#61].

6. For other good and valid reasons to be shown at the hearing of the Motion to Sell Real Estate.

Respectfully submitted, this the 23rd day of February, 2023.

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By: /s/ Elizabeth Crowell Price
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CERTIFICATE OF SERVICE

I, Elizabeth Crowell Price, hereby certify that I have notified all interested parties of the Response to the Motion to Sell Real Estate filed by Wells Fargo Bank, N.A., who are listed as follows:

Karen McDaniel Todd
319 West Sibley Circle
Pachuta, MS, 39347

Thomas Carl Rollins, Jr
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by electronic transmission or by mailing this notice and a copy of the Response to the Motion to Sell Real Estate filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this the 23rd day of February 2023.

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By: /s/ Elizabeth Crowell Price
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